



Norman H. Bangerter
Governor
Kenneth L. Alkema
Executive Director
Don A. Ostler, P.E.
Director

State of Utah
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY

288 North 1460 West
Salt Lake City, Utah
(801) 538-6146
(801) 538-6016 Fax

November 5, 1991

Reply to: State of Utah
Division of Water Quality
Department of Environmental Quality
Salt Lake City, Utah 84114-4870

Mr. Ken Kluksdahl, Manager
Tenneco Minerals
P.O. Box 2650
St. George, Utah 84770

RE: Procedures for Ground Water Investigations,
Item No. 4, Notice of
Violation, Docket No. I91-03

Dear Mr. Kluksdahl:

This correspondence is in reply to your letter of September 25, 1991, regarding your proposed procedures for sampling of water wells. We understand the problem of sampling the monitoring wells, which for the most part have low yields and become dry before several casing volumes can be removed. Your suggestion for using a baler and an air lift pump for collecting sequential samples will be considered adequate. All wells should be sampled on a monthly basis until 12 samples are available.

The parameter list in Table I is adequate and contains the constituents which should be collected at Tenneco, as required in previous correspondence. To sum it up, the procedures and parameters to be collected, as described in your letter, should be followed unless modified in a forthcoming ground water permit.

As stated in your letter, Item 4 of the Notice of Violation has been satisfied, with respect to submittal of plans for a ground water investigation. We are still reviewing the data submittals from wells mailed by Tenneco October 2, and have not reached a conclusion as to whether or not ground water was impacted by the early March 1991 incident; as discussed in your conclusions. Several years of sampling will probably be required to determine if there were impacts on ground water.

If you have questions, please call Mack Croft at 538-6146.

Sincerely,

Fred C. Pehrson, P.E., Manager
Permitting, Compliance & Monitoring Branch

FCP:MGC:mhf:rp

cc: Wayne Thomas, District Engineer
P:TENNECO1.LTRFILE:TENNECO